

FILED
UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

MAY 24 2023

MITCHELL R. ELFERS
CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DARAN ALBERT WHITE,

Defendant.

CRIMINAL NO. 23-760 JB

18 U.S.C. §§ 2113(a) and (d): Bank Robbery
with a Dangerous Weapon.

INDICTMENT

The Grand Jury charges:

On or about June 7, 2022, in Cibola County, in the District of New Mexico, the defendant, **DARAN ALBERT WHITE**, by force, violence, and intimidation, did take from the person and presence of another a sum of U.S. currency belonging to and in the care, custody, control, management and possession of Wells Fargo Bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and in committing such offense, the defendant did assault and put in jeopardy the life of another person by use of a dangerous weapon, that is a firearm.

In violation of 18 U.S.C. §§ 2113(a) and (d).

FORFEITURE ALLEGATION

Upon conviction of any offense in violation of 18 U.S.C. § 2113, the defendant, **DARAN ALBERT WHITE**, shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d), 18 U.S.C. § 981(a)(1)(C), and 28 U.S.C. § 2461(c), any firearms and ammunition involved in or used in the

commission of the offense, as well as any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

The property to be forfeited to the United States includes, but is not limited to, the following:

1. MONEY JUDGMENT

A sum of money representing the property constituting, or derived from, any proceeds that the defendant obtained, directly or indirectly, as a result of the offense set forth in the Count of conviction.

2. PERSONAL PROPERTY

- a. a Hi-Point C9 model 9mm pistol, serial number P10165310.

3. SUBSTITUTE ASSETS

If any of the above-described property constituting or derived from any proceeds that the defendant obtained as a result of the offense set forth in the Court of conviction, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence,
- b. has been transferred or sold to, or deposited with, a third party,
- c. has been placed beyond the jurisdiction of the Court,
- d. has been substantially diminished in value, or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this paragraph.

A TRUE BILL:

151
FOREPERSON OF THE GRAND JURY


Assistant United States Attorney
SJM